

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF NORTH CAROLINA
CHARLOTTE DIVISION
3:22-MD-03036-KDB

IN RE: GARDASIL PRODUCTS LIABILITY
LITIGATION

MDL No. 3036

THIS DOCUMENT RELATES TO
ALL BELLWETHER CASES

**MERCK'S AMENDED MOTION TO EXCLUDE TESTIMONY AND OPINIONS
OF PLAINTIFFS' EXPERT PETER GÖTZSCHE, M.D.**

Fed R. Evid. 702, Local Civ. R. 7.1

Defendants Merck & Co., Inc. and Merck, Sharp & Dohme LLC (together, "Merck")
respectfully move to exclude the testimony of Plaintiffs' expert Peter Götzsche, M.D. In support
of this motion, Merck concurrently submits its Memorandum in Support.

This the 6th day of January, 2025.

/s/ Allyson M. Julien

Allyson M. Julien
Edward Dumoulin
Co-Lead Counsel for Merck
GOLDMAN ISMAIL TOMASELLI
BRENNAN & BAUM LLP
200 South Wacker Drive
22nd Floor
Chicago, IL 60606
Telephone: (312) 881-5968
Facsimile: (312) 881-5191
ajulien@goldmanismail.com
edumoulin@goldmanismail.com

David C. Wright III
Liaison Counsel for Merck
ROBINSON, BRADSHAW & HINSON P.A.

101 N. Tryon Street, Suite 1900
Charlotte, NC 28246
Telephone: (704) 377-8322
Facsimile: (704) 373-3922
dwright@robinsonbradshaw.com

David E. Dukes
Co-Lead Counsel for Merck
NELSON MULLINS RILEY &
SCARBOROUGH LLP
1320 Main St., 17th Floor
Columbia, SC 29201
Telephone: (803) 255-9451
Facsimile: (803) 256-7500
david.dukes@nelsonmullins.com